

# RAWLE & HENDERSON LLP

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February 18, 2022

## **VIA ECF**

The Honorable Lois Bloom  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Lauren Vasquez v. J.B. Hunt Transport, Inc. et. ano.  
1:22-cv-00372-PKC-LB  
Rawle File No.: 805184

Dear Magistrate Judge Bloom:

Please accept the following as our joint letter with regard to the above-referenced matter.

This case was removed on January 21, 2022 from the Supreme Court of the State of New York, County of Queens, to the United States District Court, Eastern District of New York. Unfortunately, neither I nor plaintiff's attorney (Kevin Lillis, who has electronically co-signed this letter) had Your Honor's Scheduling Order in our calendars as a result of clerical errors and confusion by our respective offices due to the case changing venues from the Supreme Court of the State of New York to the United States District Court, Eastern District of New York. Your Honor's Scheduling Order sets forth the following:

- Any party seeking a trial by jury shall file a jury demand by January 21, 2022. Fed. R. Civ. P. 81(c)(3)(A).
- Defendants shall respond to plaintiff's Complaint by January 28, 2022. F.R.C.P. 81(c)(2)(C).
- The parties shall exchange their Rule 26(a)(1) initial disclosures and file their Rule 26(f) Meeting Report with the Court by February 10, 2022.

- An initial conference by telephone on February 17, 2022 at 10:00 a.m. The parties shall call the Chambers telephone conference line at (888) 363-4734 and use the access code 4444221 promptly at 10:00 a.m.

Defendant electronically filed a Verified Answer to Plaintiff's Verified Complaint on January 26, 2022 and most, if not all, of the discovery has already been concluded in the State Court (most importantly, Plaintiff's deposition was conducted on May 12, 2021, Defendant's deposition was conducted on May 19, 2021 and the Note of Issue was filed in State Court on January 11, 2022). **We both sincerely apologize and respectfully request that new dates be issued for the above.**

Please further note that when the Court emailed the parties on the morning of February 17, 2022, neither Mr. Lillis nor I was at our respective computers and when I did see the email I immediately contacted Mr. Lillis and we agreed I would contact the Court at the telephone number and access code provided. Unfortunately, I interrupted another conference and I apologize for that. Mr. Lillis and I assure Your Honor that this will not happen again.

If the Court requires any additional information or wishes to speak with the parties, we will make ourselves available at any time that is convenient for Your Honor. Thank you for Your Honor's attention to this matter.

Very truly yours,

RAWLE & HENDERSON LLP



By: Stephen J. Levy

SJL:lmh

CONSENTED TO:

*Kevin Lillis*

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Kevin G. Lillis  
Attorney for plaintiff